

AI-QUAN JACKSON

FULL NAME

AI-QUAN JACKSON

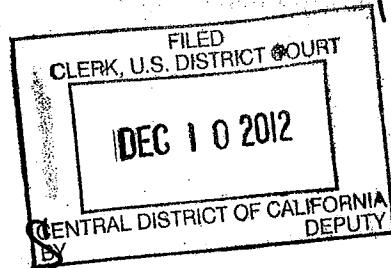
COMMITTED NAME (if different)

P.B.S.P. A-61222 LOW P.O. Box 7500

FULL ADDRESS INCLUDING NAME OF INSTITUTION

CRESCENT CITY, CA 95532V-14150

PRISON NUMBER (if applicable)



UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

AI-QUAN JACKSON

PLAINTIFF,

v.  
Leroy Baca, et. al. John Doe's (employees  
of the Los Angeles County  
Sheriff's Department.)

DEFENDANT(S).

CASE NUMBER

CV12-10393 JST (JEM)

To be supplied by the Clerk

CIVIL RIGHTS COMPLAINT  
PURSUANT TO (Check one)

 42 U.S.C. § 1983 Bivens v. Six Unknown Agents 403 U.S. 388 (1971)

## A. PREVIOUS LAWSUITS

1. Have you brought any other lawsuits in a federal court while a prisoner:  Yes  No
2. If your answer to "1." is yes, how many? \_\_\_\_\_

Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on an attached piece of paper using the same outline.)

LODGED

2012 DEC - 5 AM 10: 59

CLERK, U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES

BY



a. Parties to this previous lawsuit:

Plaintiff \_\_\_\_\_

Defendants \_\_\_\_\_

b. Court \_\_\_\_\_

c. Docket or case number \_\_\_\_\_

d. Name of judge to whom case was assigned \_\_\_\_\_

e. Disposition (For example: Was the case dismissed? If so, what was the basis for dismissal? Was it appealed? Is it still pending?) \_\_\_\_\_

f. Issues raised: \_\_\_\_\_

g. Approximate date of filing lawsuit: \_\_\_\_\_

h. Approximate date of disposition \_\_\_\_\_

**B. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

1. Is there a grievance procedure available at the institution where the events relating to your current complaint occurred?  Yes  No

2. Have you filed a grievance concerning the facts relating to your current complaint?  Yes  No

If your answer is no, explain why not \_\_\_\_\_

3. Is the grievance procedure completed?  Yes  No

If your answer is no, explain why not \_\_\_\_\_

4. Please attach copies of papers related to the grievance procedure.

**C. JURISDICTION**

This complaint alleges that the civil rights of plaintiff AI-QUAN JACKSON

(print plaintiff's name)

who presently resides at PELICAN BAY STATE PRISON P.O. Box 7600 CRESTON CITY CA 95332  
(mailing address or place of confinement)

were violated by the actions of the defendant(s) named below, which actions were directed against plaintiff at

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT (MEN'S CENTRAL JAIL) LA, CA  
(institution/city where violation occurred)

**NOTE:** You need not name more than one defendant or allege more than one claim. If you are naming more than five (5) defendants, make a copy of this page to provide the information for additional defendants.

1. Defendant LEROY BACA, et al. JOHN DOE  
(full name of first defendant) resides or works at  
441 BAUCHET ST. LOS ANGELES COUNTY JAIL  
(full address of first defendant)  
SHERIFF, SHERIFF DEPUTIES  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both):  individual  official capacity.

Explain how this defendant was acting under color of law:

DEFENDANT'S JOHN DOE, ALL USED UNNECESSARY AND EXCESSIVE FORCE ON PLAINTIFF

DEFENDANT LEROY BACA KNEW, OR SHOULD HAVE KNOWN WHAT DEFENDANT'S JOHN DOE DID TO PLAINTIFF

2. Defendant \_\_\_\_\_ resides or works at  
(full name of first defendant)  
  
\_\_\_\_\_  
(full address of first defendant)  
  
\_\_\_\_\_  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both):  individual  official capacity.

Explain how this defendant was acting under color of law:

Defendant \_\_\_\_\_ resides or works at  
(full name of first defendant)

\_\_\_\_\_ (full address of first defendant)

\_\_\_\_\_ (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both):  individual  official capacity.

Explain how this defendant was acting under color of law:

4. Defendant \_\_\_\_\_ resides or works at \_\_\_\_\_  
(full name of first defendant)

\_\_\_\_\_  
(full address of first defendant)

\_\_\_\_\_  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both):  individual  official capacity.

Explain how this defendant was acting under color of law:

\_\_\_\_\_

\_\_\_\_\_

5. Defendant \_\_\_\_\_ resides or works at \_\_\_\_\_  
(full name of first defendant)

\_\_\_\_\_  
(full address of first defendant)

\_\_\_\_\_  
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both):  individual  official capacity.

Explain how this defendant was acting under color of law:

\_\_\_\_\_

\_\_\_\_\_

**D. CLAIMS\***

**CLAIM I**

The following civil right has been violated:

Under United States code U.S.C 42, section 1983 wherein defendants used unnecessary and excessive force against plaintiff

Supporting Facts: Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be certain you describe, in separately numbered paragraphs, exactly what each DEFENDANT (by name) did to violate your right.

On 12-11-11 between the hours of 9:00-11:00 a.m Al-Quan Jackson (Plaintiff) was transferring between modules 3600-3800 to 3200-3400. Just before Al-Quan Jackson and other inmates were strip searched Al-Quan presented his personal property, along with a fictitious pass made/produced by Deputy Colon and authorized by Deputy Lane of the CST (Operation Safe Jail) on 12-9-11 pertaining to an ongoing murder investigation in which Al-Quan Jackson was a witness to. The pass was to serve as an alibi as to Al-Quan's whereabouts during the time of the murder. When retrieving his personal property Al-Quan noticed the pass was taken. Al-Quan then asked for the pass to be returned in which the plead for it to be returned fell on deaf ears. As the other inmates left the area Al-Quan explained why the pass was needed. Deputies et.al. John Doe still refused to return the pass. Words were then exchanged between Al-Quan and Deputy et.al. John Doe. In order to deescalate

*\*If there is more than one claim, describe the additional claim(s) on another attached piece of paper using the same outline.*

the situation, Al-Quan voluntarily laid on the floor, placing his hands behind him without resistance. While being cuffed he was tasered, sprayed and kicked repeatedly ~~never~~ but never once resisted or posed any threat to deputies because Al-Quan voluntarily laid on the floor and proned out.

**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following specific relief:

Defendants Barn, and each of them, et. al. John Doe ~~John Doe et al.~~ To be held  
punitivey responsible for their acts, omissions and failure to protect.  
Petitioner/claimant seeks nominal damages according to proof in the amount  
the jury and or court deems appropriate.

11-25-12

(Date)

Alquan Jackson  
(Signature of Plaintiff)



COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL

648 KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

JOHN F. KRATTLI  
County Counsel

July 2, 2012

TELEPHONE  
(213) 974-1913  
FACSIMILE  
(213) 687-8822  
TDD  
(213) 633-0901

Al-Quan L. Jackson  
c/o Thomas L. Adams  
15720 Glendon Creek Ct.  
Riverside, California 92503

Re: **Claim(s) Filed:** **May 11, 2012**  
**File Number(s):** **12-1098397\*001**

Dear Mr. Adams:

Notice is hereby given that the above-referenced claim which you filed with the Los Angeles County Board of Supervisors was deemed denied by operation of law on **June 26, 2012**, in accordance with Government Code, §912.4(a).

STATE LAW REQUIRES THAT YOU BE GIVEN THE FOLLOWING "WARNING:"

Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file a court action on this claim. SEE GOVERNMENT CODE SECTION 945.6.

This time limitation applies only to causes of action for which Government Code Sections 900 - 915.4 required you to present a claim. Other causes of action, including those arising under federal law, may have different time limitations.

You may seek the advice of an attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately.

Very truly yours,

JOHN F. KRATTLI  
County Counsel

By

LILIANA CAMPOS  
Deputy County Counsel  
General Litigation Division

LC:ce

HOA.883689.1

**DECLARATION FOR SERVICE BY MAIL**

STATE OF CALIFORNIA  
County of Los Angeles

I am and at all times herein mentioned have been a citizen of the United States and resident of the County of Los Angeles, over the age of eighteen years and not a party to nor interested in the within action; that my business address is 648 Kenneth Hahn Hall of Administration, City of Los Angeles, County of Los Angeles, State of California 90012.

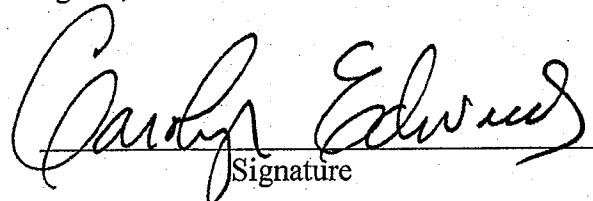
That on the 3rd day of July 2012, I served the attached "Notice of Denial Letter" upon claimant by depositing a copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in a United States mail box in Los Angeles, California addressed as follows:

Al-Quan L. Jackson  
c/o Thomas L. Adams  
15720 Glendon Creek Ct.  
Riverside, California 92503

and that the person on whom said service was made has/resides his/her office at a place where there is a regular communication by mail between the place of mailing and the place so addressed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd day of July 2012, at Los Angeles, California.

  
Signature



## INSTRUCTIONS:

1. Read entire claim thoroughly.
2. Fill out the claim completely.
3. This claim form must be signed.
4. Submit original signed copy.
5. Photocopies may be made for your records.

## WARNING

- Claims for death, injury to person or to personal property must be filed no later than 6 months after the occurrence. (GOV. CODE SECTION 911.2)
- All other claims for damages must be filed no later than one year after the occurrence. (GOV. CODE SECTION 911.2)
- Subject to certain exception, you have only six months from the date of written notice of rejection of your claim to file a court action. (GOV. CODE SECTION 945.6)
- If written notice of rejection of your claim is not given, you have 2 years from accrual of the cause of the action to file a court action. (GOV. CODE SECTION 945.6)

TIME STAMP HERE  
FOR OFFICE USE ONLY

## 1. WHEN AND WHERE DID DAMAGE OR INJURY OCCUR?

DATE: 12-11-11 TIME: 9:00 - 10:00 AM STREET ADDRESS OR LOCATION: 441 BAUCHET ST CITY: LA ZIP: 90012

## 15. WERE THE PARAMEDICS CALLED?

N/A

## 2. NAME(S) OF SHERIFF PERSONNEL INVOLVED:

NAME: DEPUTY RIVERA STATION/FACILITY: MEN'S CENTRAL JAIL

NAME: SGT. ZHONDVER STATION/FACILITY: MEN'S CENTRAL JAIL  
CPT. ORNELAS

## 16. DID THE CLAIMANT VISIT A PHYSICIAN?

## PHYSICIAN'S NAME:

IN HOUSE MEDICAL UNITADDRESS/PHONE: 441 BAUCHET ST  
LA, CA 90012

DATE OF VISIT:

## 3. DESCRIBE IN DETAIL HOW DAMAGE OR INJURY OCCURRED:

(Use attachments if necessary)

(SEE ATTACHMENT)

## 4. WHY DO YOU CLAIM THE SHERIFF'S DEPARTMENT IS RESPONSIBLE?

UNNECESSARY FORCE USED ON HANDCUFFED INMATE  
(SEE VIDEO FOOTAGE)

## 5. LIST DAMAGES INCURRED TO DATE (Attach Copy of Receipts &amp; Repair Estimates)

BRUISING (SEE MEDICAL REPORT)

## 17. WITNESS TO DAMAGE OR INJURY?

NAME: SEE VIDEOADDRESS: FOOTAGECITY/PHONE: FOOTAGENAME: SEE VIDEOADDRESS: FOOTAGECITY/PHONE: FOOTAGE

## 6. SHERIFF'S DEPARTMENT FILE OR REPORT#

## 7. NAME OF CLAIMANT (Print Clearly)

AL QUAN L. JACKSON

## 8. DRIVER'S LICENSE OR ID. #

D2673841

## 9. DATE OF BIRTH

## 10. SOCIAL SECURITY

3-16-84 # 276-82-9666

## 11. Booking Number (if applicable)

22495

## 12. CORRESPONDENCE ADDRESS - (STREET, CITY, STATE, ZIP)

15720 GLENNDON CREEK CT. RIVERSIDE, CA 92503

## 13. HOME PHONE (or phone you can be contacted at)

323 308-9907( ) N/A

## TOTAL DAMAGES TO DATE

\$ N/A

## TOTAL ESTIMATED DAMAGES

\$ N/A

THIS CLAIM MUST BE SIGNED

NOTE: PRESENTATION OF A FALSE CLAIM IS A FELONY (PENAL CODE SEC. 72.)

## 18. SIGNATURE OF CLAIMANT OR PERSON FILING ON HIS/HER BEHALF:

Thomas L. Adams19. PRINT OR TYPE NAME THOMAS L. ADAMS DATE 5-11-12

Deliver or mail to Executive Officer, Board of Supervisors, County of Los Angeles, Room 383, Kenneth Hahn Hall of Administration, 500 W. Temple St. LA, CA 90012

On 12-11-11 between 9:00 - 11:00 am, Al-Quan Jackson was transferring between modules 3638 to 3234. Just before he and the other inmates were strip searched, he presented his personal property, along with a fictitious pass made by Deputies Colon & Lane from OSJ (Operation Safe Jail) on 12-9-11, pertaining to an ongoing murder investigation of an inmate. When retrieving his personal property, words were exchanged with one of the officers regarding the pass not being returned to Al-Quan, as the other inmates left the area. In order to deescalate the situation, Al-Quan voluntarily laid on the floor, placing his hands behind him without resistance. While cuffed, he was tazered, sprayed and kicked.

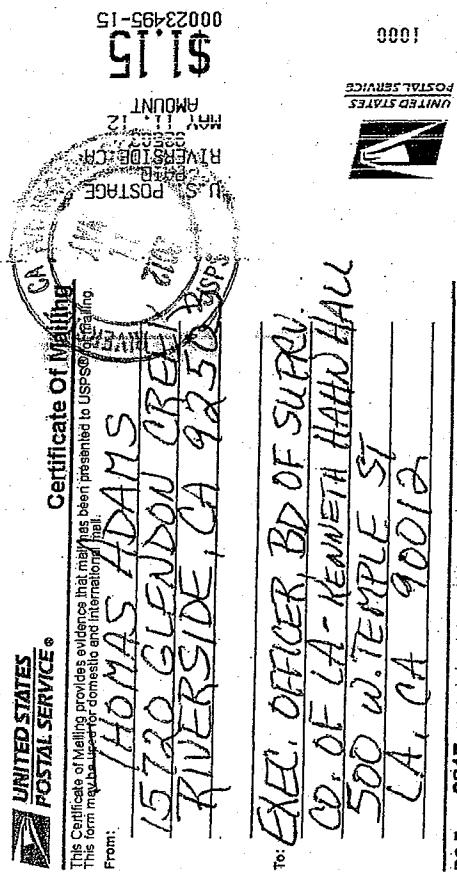
Arlington Station Post Office  
Riverside, California  
925033457  
0567760503 -0093  
05/11/2012 (800)275-8777 11:19:27 AM

Product Description	Sales Qty	Receipt Unit Price	Final Price
---------------------	-----------	--------------------	-------------

LOS ANGELES, CA 90012	\$0.45
Zone-1 First-Class Letter	0.60 oz.
=====	
Issue PVI:	\$0.45
Certificate of Mailing	1 \$1.15
Miscellaneous Purchases	\$0.25
AIC: 126	
Misc Rev - Other	
=====	
Total:	\$1.85

Paid by:	
Cash	\$1.90
Change Due:	-\$0.05

\*\*\*\*\*  
\*\*\*\*\*  
BRIGHTEN SOMEONE'S MAILBOX. Greeting cards available for purchase at select Post Offices.  
\*\*\*\*\*  
\*\*\*\*\*



NAME: Al-Quan Jackson

CDC NO: V14150 HOUSING: B-6 2nd Low

PELICAN BAY STATE PRISON  
PO. BOX 7500  
CRESCENT CITY, CA 95532

PELICAN BAY STATE PRISON  
Block 4, Unit 2, Room 10  
Inmate Care Unit

1983

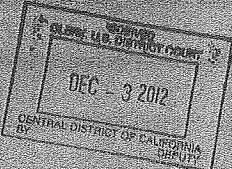
UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

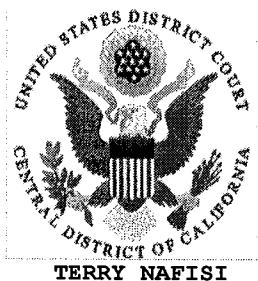
312 NORTH SPRING ST. ROOM 6-8

LOS ANGELES, CALIFORNIA 90012

(ATTENTION: PRO SE CLERK)



LEGAL MAIL



**TERRY NAFISI**

District Court Executive  
and Clerk of Court

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION  
312 North Spring Street, Room G-8 Los  
Angeles, CA 90012  
Tel: (213) 894-7984

SOUTHERN DIVISION  
411 West Fourth Street, Suite 1053  
Santa Ana, CA 92701-4516  
(714) 338-4570

EASTERN DIVISION  
3470 Twelfth Street, Room 134  
Riverside, CA 92501  
(951) 328-4450

Monday, December 10, 2012

AL-QUAN JACKSON CDC#V14150  
P.B.S.P.  
P. O. BOX 7500  
CRESCENT CITY, CA. 95532

Dear Sir/Madam:

A Complaint for Civil Rights was filed today on your behalf and assigned civil case number  
CV12- 10393 JST (JEM)

A  Motion for Extension of Time to File Habeas Corpus Petition was filed today on your behalf and assigned civil case number \_\_\_\_\_

Please refer to this case number in all future communications.

Please Address all correspondence to the attention of the Courtroom Deputy for:

District Court Judge \_\_\_\_\_  
 Magistrate Judge John E. McDermott

at the following address:

U.S. District Court  
312 N. Spring Street  
Civil Section, Room G-8  
Los Angeles, CA 90012

Ronald Reagan Federal  
Building and U.S. Courthouse  
411 West Fourth St., Suite 1053  
Santa Ana, CA 92701-4516

U.S. District Court  
3470 Twelfth Street  
Room 134  
Riverside, CA 92501

The Court must be notified within fifteen (15) days of any address change. If mail directed to your address of record is returned undelivered by the Post Office, and if the Court and opposing counsel are not notified in writing within fifteen (15) days thereafter of your current address, the Court may dismiss the case with or without prejudice for want of prosecution.

Sincerely,  
Clerk, U.S. District Court

By: CSAWYER  
Deputy Clerk